

April 17, 2002
Draft



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C. 20460

April 18, 2002

OFFICE OF
THE ADMINISTRATOR
EPA SCIENCE ADVISORY BOARD

Note to the Reader:

The attached draft report is a draft report of the EPA Science Advisory Board (SAB). The draft is still undergoing final internal SAB review, however, in its present form, it represents the consensus position of the panel involved in developing the report. Once approved as final, the report will be transmitted to the EPA Administrator and will become available to the interested public as a final report.

This draft has been released for general information to members of the interested public and to EPA staff. This is consistent with the SAB policy of releasing draft materials only when the Committee involved is comfortable that the document is sufficiently complete to provide useful information to the reader. The reader should remember that this is an unapproved working draft and that the document should not be used to represent official EPA or SAB views or advice. Draft documents at this stage of the process often undergo significant revisions before the final version is approved and published.

The SAB is interested in public comments on the draft document, especially in regard to whether any statements or responses in the draft are unclear. Consistent with SAB policy on this

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1 matter, the SAB is not obligated to address any responses which it receives. Responses are due
2 no later than May 1, 2002.

3
4 For further information or to respond to the questions above, please contact:

5
6 Dr. Angela Nugent, Designated Federal Officer

7 EPA Science Advisory Board (1400A)

8 US Environmental Protection Agency

9 1200 Pennsylvania Avenue, NW

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13
14

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United States
Environmental
Protection Agency

EPA Science Advisory
Board (1400A)
Washington, DC

EPA-SAB-EEC-COM-02-00X
May 2002
www.epa.gov/sab



EPA Science Advisory Board
(SAB) Panel Formation Process:
Immediate Steps to Improve
Policies and Procedures

An SAB Commentary

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NOTICE

This report has been written as part of the activities of the EPA Science Advisory Board, a public advisory group providing extramural scientific information and advice to the Administrator and other officials of the Environmental Protection Agency. The Board is structured to provide balanced, expert assessment of scientific matters related to problems facing the Agency. This report has not been reviewed for approval by the Agency and, hence, the contents of this report do not necessarily represent the views and policies of the Environmental Protection Agency, nor of other agencies in the Executive Branch of the Federal government, nor does mention of trade names or commercial products constitute a recommendation for use.

Distribution and Availability: This EPA Science Advisory Board report is provided to the EPA Administrator, senior Agency management, appropriate program staff, interested members of the public, and is posted on the SAB website (www.epa.gov/sab). Information on its availability is also provided in the SAB's monthly newsletter (*Happenings at the Science Advisory Board*). Additional copies and further information are available from the SAB Staff [US EPA Science Advisory Board (1400A), 1200 Pennsylvania Avenue, NW, Washington, DC 20460-0001; 202-

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1 564-4533].

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**U.S. Environmental Protection Agency
EPA Science Advisory Board
Executive Committee
Policies and Procedures Subcommittee***

CHAIR

Dr. Henry Anderson, Wisconsin Division of Public Health, Madison, WI
Also Member: Environmental Health Committee
Integrated Human Exposure Committee

EXECUTIVE COMMITTEE MEMBERS

Dr. Linda Greer, Natural Resources Defense Council, Washington, DC

Dr. Philip Hopke, Clarkson University, Potsdam, NY
Also Member: Clean Air Scientific Advisory Committee
Research Strategies Advisory Committee

Dr. Raymond C. Loehr, The University of Texas at Austin, Austin, TX
Also Member: Research Strategies Advisory Committee

SCIENCE ADVISORY BOARD STAFF

Dr. Donald Barnes, Staff Director

Mr. Thomas Miller, Designated Federal Officer

Dr. Angela Nugent, Designated Federal Officer

Ms. Kathleen White, Designated Federal Officer

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Insert Date

EPA-SAB-EC-COM-002-00X

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

SUBJECT: EPA Science Advisory Board (SAB) Panel Formation Process:
Immediate Steps to Improve Policies and Procedures: An SAB
Commentary

Dear Governor Whitman:

In July 2001, the Executive Committee of the EPA Science Advisory Board (SAB) sent you a short letter informing you of our intent to form an Executive Committee group to work with the SAB Staff Office to address issues raised in a report issued by the General Accounting Office (GAO), *EPA's Science Advisory Board Panels: Improved Policies and Procedures Needed to Ensure Independence and Balance* (GAO-01-536, June 12, 2001). This group, the Policies and Procedures Subcommittee (PPS), was charged with reviewing and modifying, as appropriate, SAB policies and procedures in light of the GAO report, with the intent of maintaining and enhancing the quality, credibility, and efficiency of the SAB.

The PPS focused on the two principal concerns of the GAO report: 1) the need to ensure that SAB panelists are independent and that the panels are properly balanced; and 2) the need to ensure that the public is sufficiently informed about the formation of SAB Panels. The PPS briefed the Executive Committee on March 7, 2002 on the results of its work.

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1 After careful consultation with parties interested in and knowledgeable about the work of
2 the SAB, the Subcommittee has designed a four-stage process to improve panel formation at the
3 Board. This process is intended not only to make the process more transparent to the public, but
4 also to gain the benefit of public involvement in forming panels at the SAB. We believe this
5 process clarifies the approach to balancing panels at the Board and helps to avoid conflicts of
6 interest and the appearance of lack of impartiality on the part of panel members. In regard to
7 balance, the process details that at the SAB, a balanced panel is characterized by inclusion of all
8 necessary domains of knowledge, all relevant scientific perspectives, and the collective breadth
9 of experience to address the charge adequately. This is important because the SAB is a technical
10 advisory body, not a committee designed to reflect stakeholder views. Hence, balancing
11 membership is driven by concerns over scientific and technical expertise, not stakeholder
12 address.

13
14 The PPS has drafted a description of the new process in a short booklet, entitled
15 *Overview of the SAB Panel Formation Process* (draft attached). The booklet has been designed
16 to communicate with SAB Members and Consultants, the public, and EPA staff. We believe
17 that the general approach outlined, if implemented consistently, will strengthen the SAB's
18 policies and procedures, thereby maintaining and enhancing the quality and credibility of the
19 Board's work. We have asked the SAB staff to seek public comment on the draft booklet to
20 determine: 1) whether the document describes the new processes in a sufficiently clear way, that
21 the public can understand and participate in the process; and 2) whether there might be any
22 additional suggestions to strengthen the Board's operations, including panel formation.

23
24 An important part of the panel formation process described in the draft booklet is the
25 completion of a revised alternate confidential disclosure form (also attached) that will be used by
26 SAB Members and Consultants, after formal approval by the Office of Government Ethics. We
27 understand that the new form will also be used by other Special Government Employees who
28 serve on Agency Federal Advisory Committees. This form will allow the Agency to collect
29 information about prospective panelists that is necessary to determine whether there is: 1) a
30 statutory conflict of interest between their public responsibilities and their private interests, or 2)

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a possible appearance of lack of impartiality, as defined by federal regulation. The Executive Committee understands that the ethics regulations do allow for participation on SAB Panels by individuals who have a conflict-of-interest, if EPA determines and documents in a waiver letter that the need for the individual's service outweighs the conflict of interest. However, the Executive Committee has advised the Agency that the issuing of a waivers should be a rare event, exercised by the SAB Staff Director only upon explicit, prior consultation with the Panel Chair, Standing Committee Chair, and the Chair of the Executive Committee.

Considerable progress has been made, but the work of the PPS is not over. The Executive Committee has reconstituted the PPS as a standing subcommittee of the Executive Committee (roster attached) to provide advice to the Agency and the SAB Staff on a broad range of issues relating to the policies and procedures of the Board. Issues to be addressed may include: the choice of projects for the SAB; panel deliberations and report writing; the respective roles of the Executive Committee, SAB Standing Committees, and panels; the role of the SAB Staff; and communication. We also anticipate that the PPS will advise the SAB Staff in developing guidance on SAB operations, modeled on publications produced by The National Academies, for use by panel chairs, panel members, Agency program offices, and the public.

We appreciate the cooperation of the Agency in the efforts of the PPS, particularly those of Mr. Kenneth Wernick and Ms. Marilyn Kuray in the Office of General Counsel. We look forward to your response to this Commentary.

Sincerely,

Dr. William Glaze, Chair
EPA Science Advisory Board

Dr. Henry Anderson, Chair
Policies and Procedures Subcommittee

Attachments:

(1) Draft booklet, *Overview of the SAB Panel Formation Process*

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- 1 (2) Draft form, *Confidential Financial Disclosure Form for Special Government Employees*
- 2 *Serving on Federal Advisory Committees at the U.S. Environmental Protection Agency*
- 3 (3) Roster of the PPS, as reconstituted on March 13, 2002

Attachment 1

**Overview of the Panel Formation Process at the
EPA Science Advisory Board****A. Introduction to this Booklet**

This booklet provides a general introduction to the U.S. Environmental Protection Agency Science Advisory Board (SAB) and one key part of its advisory process: forming advisory panels and making decisions about conflict of interest and balance among panelists. Although each SAB project is different, the process of panel formation follows the same basic steps.

The SAB also plans to develop companion booklets that will give an overview of the other key steps in the advisory process, such as choosing projects; panel deliberations and report writing; the respective roles of the Executive Committee, standing committees, and special panels; the role of the SAB Staff; and communication.

The Board will provide more detailed information on each of those topics specifically for panel chairs; members of the public interested in participating in the SAB advisory process, and Agency staff interested in working with the SAB on topics of concern to them.

B. About the U.S. Environmental Protection Science Advisory Board

The SAB has played a unique role in environmental protection for more than twenty-five years. Congress authorized it to provide independent advice and peer review to EPA's Administrator and the Congress on the scientific and technical aspects of environmental problems and issues.

1 The Board focuses on technical issues, not policy issues; risk assessment and engineering
2 issues, not risk management decisions; the adequacy of the scientific foundation on which an
3 Agency position (e.g., a regulatory standard) is built, not the position itself. The SAB recognizes
4 the Agency's need to make environmental policy, risk management, and regulatory decisions but
5 does not advise the Agency on them. It does not advise on those decisions directly. Instead it
6 limits its advice to the scientific and technical underpinnings on which those decisions rest.
7 Where the Board's advice does touch on policy issues, it takes special care to note when that
8 advice goes beyond the Agency's charge.

9
10 The Board strives to produce advice that is technically and scientifically sound,
11 independent, balanced, and useful to the Agency. All the processes and procedures the SAB
12 uses, from the choice of members for panels, to choice of projects, to involvement of the public,
13 to development of reports aim to achieve these goals.

14
15 The scope of the Board is potentially as wide as all of the scientific and technical issues
16 associated with environmental problems. To guide the Board's activities and set priorities, the
17 SAB's Executive Committee described the Board's mission as making "a positive difference in
18 the production and use of science at EPA." The Board uses this mission statement as it works
19 with the Agency to set priorities for the Board's work. In this process, the SAB seeks to work
20 cooperatively with the Agency to support its mission and goals, while maintaining the
21 independence necessary to provide the Agency information, knowledge, and critical advice in a
22 credible manner. This relationship has been described as "operating at arm's length from the
23 Agency," and the SAB's being "*in* the Agency but not *of* the Agency."

24
25 The Board provides advice in a variety of ways. It issues written peer review "Reports"
26 of Agency documents. It writes "Advisories," when it has reviewed Agency works-in-progress.
27 It initiates "Commentaries" or more extensive original reports on topics that Members believe to
28 be important to environmental protection. It provides the Agency an opportunity for
29 "Consultations" at the earliest stages of development of a project to gain insights from

1 independent Members and Consultants. Finally, it hosts “Workshops” on important scientific
2 issues, in which the Board itself does not provide advice, but instead sponsors meetings where
3 the Agency can be stimulated by the work of highly qualified technical people.

4
5 The SAB currently consists of 10 standing committees, whose activities are coordinated
6 by an Executive Committee. Two of the committees, the Clean Air Scientific Advisory
7 Committee (CASAC), and the Advisory Council on Clean Air Compliance Analysis, (the
8 Council) are separately chartered and report directly to the Administrator. All of the other
9 Committees report to the Administrator through the SAB’s Executive Committee.

10
11
12 **The SAB’s Ten Standing Committees Whose Activities
are Coordinated by the SAB Executive Committee (EC)**

Advisory Council on Clean Air Compliance Analysis (Council)
Clean Air Scientific Advisory Committee (CASAC)
Drinking Water Committee (DWC)
Ecological Processes and Effects Committee (EPEC)
Environmental Economics Advisory Committee (EEAC)
Environmental Engineering Committee (EEC)
Environmental Health Committee (EHC)
Integrated Human Exposure Committee (IHEC)
Radiation Advisory Committee (RAC)
Research Strategies Advisory Committee (RSAC)

13
14
15 In addition to the 100-plus SAB Members who are appointed generally to two-year
16 terms by the Administrator, the Board enlists *ad hoc* Consultants to bring focused expertise to
17 bear on particular issues that come before the Board. There are currently more than 300 SAB

1 Consultants, who are appointed to one-year, renewable terms by the SAB Staff Director.

2
3 The EPA SAB is a federal advisory committee, subject to the Federal Advisory
4 Committee Act provisions that require membership of the advisory committee to: 1) be fairly
5 balanced in terms of the points of view represented and the functions to be performed by the
6 advisory committee, and 2) ensure contemporaneous public access and public input into the
7 advisory process.

8
9 The Members and Consultants of the Board serve as Special Government Employees,
10 who are subject to the provisions of the Ethics in Government Act of 1978.

11
12
13 **C. The Panel Formation Process, Including Consideration of Conflict of Interest and**
14 **Balance Among Panelists**

15
16
17 The advice provided by the SAB either is developed by *ad hoc* panels established to
18 address specific topics or by standing committees augmented, if necessary, with special expertise
19 provided by SAB consultants. EPA's SAB Staff is responsible for forming expert panels.

20
21 The SAB Staff work to ensure that the process of panel formation complies with the
22 requirements of the Federal Advisory Committee Act and the Ethics in Government Act; that it
23 is transparent to the public, so the public can understand and participate in the process; and that
24 it succeeds in assembling the experts needed to provide the Agency with scientific and technical
25 advice.

26
27 The SAB Staff have adopted a process that will inform the public about each panel as it is
28 being formed. This process informs and involves the public in a step-by-step process, as
29 outlined in the diagram below.

Stages in Panel Formation at EPA's Science Advisory Board



Kickoff: SAB Staff work with the Agency and SAB Leadership to understand “What expertise is needed to address the charge?”



Widecast: SAB Staff ask: “Who should be considered for the panel?” They solicit nominations from SAB Members and Consultants and the public.



Short List: SAB Staff work with SAB leadership to determine: “Which candidates should we consider in greater detail for service on the panel?” The Staff also gathers additional information about the candidates (including confidential information from the candidates about financial conflict of interest). They also ask the public for information that will help during the Panel Selection Phase.



Panel Selection: SAB Staff determine and document: “Who will serve on the panel?”

The goal of the panel formation process is to assemble an appropriate panel of experts to provide sound, independent, balanced, and useful scientific and technical advice. The formation of an SAB panel begins in the “**Kickoff**” stage, in which the EPA Executive Committee and the SAB Staff decide to begin a project that has a well-developed charge. The charge to the Board, which will guide - but not confine - the work of a panel, is the formal statement of the questions posed to the Board. This statement generally defines the scope, problems, and issues the panel will address. The charge needs to be sufficiently detailed that it is clear what kinds of experts are needed.

Expertise, knowledge, and experience are the primary factors that determine whether an individual is invited to serve on an SAB Panel. In forming panels to provide expert advice, SAB Staff, as required by the Ethics in Government Act of 1978, also work to screen candidates for conflicts of interest and appearance of lack of impartiality. If a conflict exists between a panel candidate’s private financial interests and activities and public responsibilities as a panel

1 member, or if there is the appearance of impartiality, as defined by federal ethics regulations,
2 the SAB Staff will, as a rule, seek to obtain the needed expertise from another individual. In
3 rare cases, the SAB Staff Director, in consultation with SAB leadership, can grant a waiver that
4 will allow an individual to serve on a panel, if it is determined that the participation of the
5 individual is so vital as to outweigh the conflict of interest. The waiver is a matter of public
6 record at the time of the panel meeting.

7
8 In addition to concerns about conflicts that may exist for individual members of a Panel,
9 the SAB is also concerned about overall balance of the panel, as mandated by the Federal
10 Advisory Committee Act. At the SAB, a balanced panel is characterized by inclusion of all
11 necessary domains of knowledge, all relevant scientific perspectives, and the collective breadth
12 of experience to address the charge adequately. The SAB is a technical advisory body, not a
13 committee designed to reflect stakeholder views; hence, balancing membership is driven by
14 concerns over scientific and technical expertise, not stakeholder address.

15
16 Recognizing that it is important to inform and involve the public in the process of panel
17 formation, the SAB has adopted specific procedures to identify candidates with the needed
18 expertise, avoid conflicts of interest, and achieve appropriate balance.

19
20 The “**Widecast**” phase includes an opportunity for the public to nominate potential panel
21 members. This request aims to gain public assistance in broadening the pool of experts from
22 whom panel members will be drawn.

23
24 In the “**Short List**” phase, SAB Staff, using established criteria, screen “Widecast
25 candidates” to identify a “short list “ of potential panel members.

Criteria to Be Used in Evaluating an Individual Panelist

1. Expertise, knowledge, and experience
2. Availability and willingness to serve
3. Scientific credibility and impartiality
4. Skills working in committees and advisory panels

1
2 SAB staff confer with candidates and search independently for background information
3 on them to understand their qualifications and points of view.
4

5 To be considered for selection on a panel, each “Short List” candidate is required, during
6 the “Short List” phase, to submit a “Confidential Financial Disclosure Form for Special
7 Government Employees Serving on Federal Advisory Committees at the U.S. Environmental
8 Protection Agency.” On that form the prospective panelist lists all professional, consulting, and
9 financial connections, including research funding. Candidates also describe any reasons their
10 impartiality in the matter being addressed might be questioned. SAB staff reviews the
11 confidential form in detail and confers with candidates to understand any potential conflict of
12 interests that might arise.
13

14 An important part of the "Short List" phase is public involvement. The SAB Staff
15 publishes the names and biosketches of "Short List" candidates on the SAB Website. The SAB
16 Staff asks the public to provide the Board with information, analysis, or documentation that the
17 Board should consider in evaluating candidates. This information plays an important part in
18 determining the panel members chosen during the “Panel Selection” Phase.
19

20 The SAB Staff Director, in consultation with SAB leadership, as appropriate, makes the
21 final decision about who will serve on the panel in the “**Panel Selection**” Phase. In that phase,
22 SAB Staff completes its review of information regarding conflicts of interest, appearance of
23 impartiality, and appropriate balance and breadth needed to address the charge. They review all
24 the information provided by candidates, along with any other information that the public may

1 provide in response to the posting of information about the prospective panel on the SAB
2 website during the “Short List Phase,” and information gathered by SAB Staff independently on
3 the background of each candidate. SAB Staff document the rationale underlying the selection of
4 each panel in a “Panel Selection” document.

5
6 The SAB’s process for panel formation has been designed for three purposes: to help the
7 Board meet EPA’s legal requirements; to be transparent to the public, so the public can
8 understand and participate in the process; and to help the Board fulfill its mission. The Board
9 can only fulfill its mission by assembling panels of individuals who will provide useful, timely
10 advice that is technically and scientifically sound, independent, and balanced. The SAB will
11 refine details of the panel formation process over time, based on the advice of its Executive
12 Committee, the Agency, and members of the public interested in the Board and its work.

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Attachment 2

Confidential Financial Disclosure Form for Special Government
Employees
Serving on Federal Advisory Committees at the U.S.
Environmental Protection Agency

**Confidential Financial Disclosure Form for Special Government Employees
Serving on Federal Advisory Committees at the U.S. Environmental Protection Agency**

General Instructions

A. Why You Must File

This report is a safeguard for you as well as the Government. It allows Government officials to determine whether there is a statutory conflict between your public responsibilities and your private interests and activities, or the appearance of impartiality, as defined by federal regulation.

What is a Special Government Employee?

A person who is retained, designated, appointed, or employed to perform, with or without compensation, for a period not to exceed 130 days during any period of 365 consecutive days, temporary duties for the Federal Government either on a full-time or intermittent basis.

Conflicts of Interest

Definition: A conflict of interest is a personal interest or relationship, as defined by law or regulation, that conflicts with the faithful performance of official duty.

18 U.S.C. 208: "An employee is prohibited from participating personally and substantially in an official capacity in any particular matter in which, to his knowledge, he or any person whose interests are imputed to him under this statute has a financial interest, if the particular matter will have a direct and predictable effect on that interest."

*Participate - "decision, approval, recommendation, or rendering advice."
Personally - "directly and includes participation of a subordinate when directed"
Substantially - "of significance to the matter"
Particular Matter - "one focused on the interests of specific persons or class"
Financial interests - "stocks, bonds, partnership interest, options"
Imputed to the employee - "self, spouse, dependent children"*

5 C.F.R. 2635.502: Appearance of lack of impartiality: "Where an employee knows that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of his household, or knows that a person with whom he has a covered relationship is or represents a party to such matter, and where the person determines that the circumstances would cause a reasonable person with knowledge of the relevant facts to question his impartiality in the matter, the employee should not participate in the matter unless he has informed the agency designee of the appearance problem and received authorization from the agency designee."

B. Who Must File

Special Government Employees (SGEs) providing advice to EPA must file this form as well as candidates who wish to be considered for such service.

C. Confidentiality of Information Provided on this Form

Title I of the Ethics in Government Act of 1978 (5 U.S.C. App.), Executive Order 12674, and 5 CFR Part 2634, Subpart I, of the Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this form is for review by Government officials at EPA to determine compliance with applicable Federal conflict of interest laws and regulations. Additional disclosures of the information on this report may be made: (1) to a Federal, State or local law enforcement agency if the disclosing agency becomes aware of a violation or potential violation of law or regulation; (2) to a court or party in a court or Federal administrative proceeding if the Government is a party or in order to comply with a judge-issued subpoena; (3) to a source when necessary to obtain information relevant to a conflict of interest investigation or decision; (4) to the National Archives and Records Administration or the General Services Administration in records management inspections; (5) to the Office of Management and Budget during legislative coordination on private relief legislation; and (6) in response to a request for discovery or for the appearance of a witness in a judicial or administrative proceeding, if the information is relevant to the subject matter. This confidential report will not be disclosed to any requesting person unless authorized by law.

D. When to file

*SGEs must file annually, between October 1 and October 31. In addition, if an SGE is new to a federal advisory committee or is being considered for a new advisory activity, the SGE must file before participating in that Committee or activity. If an SGE is being considered for a new advisory activity, and has filed annually, the SGE **must** complete Parts 1 and 9 and any other sections of the form, if the answers to the questions in those sections may have changed from the date of the last filing,*

DO NOT CITE OR QUOTE

E. Where to file

Send your response to the address specified by the Designated Federal Officer for the Committee or panel for which you are a member, consultant, or candidate.

F. General Instructions

Filers must provide sufficient information about outside interests and activities so that EPA ethics officials can make an informed judgment regarding any conflict of interest or appearance of lack of impartiality. EPA staff may contact you to obtain additional information if they see a need for that information to determine whether there is a statutory conflict between your public responsibilities and your spouse's private interests and activities.

You must include information applicable to yourself and your spouse on Parts 2-6, and for yourself, your spouse, and dependent children on Parts 7 and 8. Information about your spouse is not required in the case of divorce, permanent separation, or temporary separation with the intention of terminating the marriage or permanently separating.

DO NOT CITE OR QUOTE

Information on Reporting, Certification, and Agency Review

Reporting Individual's Name

Last Name	First Name and Middle Initial

Certification:

I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.

Signature of Reporting Individual

Signature	Date

Date received by the Agency:

Date

Signature of Designated Federal Officer or Other Intermediate Reviewer and Date:

Signature	Title	Date	Review Official's Comments Appended	
			Y	N

Signature of Agency's Final Reviewing Official and Title and Date:

Signature	Title	Date	Review Official's Comments Appended	
			Y	N

DO NOT CITE OR QUOTE

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Part 1: Statement regarding any change since annual submission of this form.

Fill out this section **only** if you have submitted a Form EPA-XXX "Confidential Financial Disclosure Form for Special Government Employees Serving on Federal Advisory Committees at the U.S. Environmental Protection Agency" in the past year.

I have reviewed my Form EPA-XXX, "Confidential Financial Disclosure Form for Special Government Employees Serving on Federal Advisory Committees at the U.S. Environmental Protection Agency" submitted on the date indicated and have made the following determinations (check column that applies):

(a) Date of last Form EPA-XXX Submitted (Month and Year)	(b) Has any information changed in Parts 2-8 from that reported on the form identified in column (a)?	
	Yes	No

If you answered "Yes" in column (b), proceed to complete **any elements in Parts 2-8 of the form that reflect changes** since you last submitted your form OGE-45XX and complete **Part 9 of the form**

If you answered "No" in column (b), **complete Part 9 of this form**. You do not need to complete other parts of the form.

Part 2: Compensated Employment

Report any position that you or your spouse have been compensated for in the preceding two years from the date of filing except independent consulting and compensated expert testimony. Positions include (but are not limited to) an employee, officer, director, trustee, general partner, proprietor, representative, or executor of a business, consulting firm, non-profit, labor organization, or educational institution. **Also include** any organization or person with whom you are negotiating with or have an arrangement with concerning prospective employment. Exclude positions with religious, arts, social, fraternal or political entities or those solely of an honorary nature.

Indicate with a checkmark any position, for which annual compensation exceeded \$2,500 for the calendar year of filing or the previous calendar year or represented 5% or more of the person's total compensation over the course of a calendar year.

If none, please check this box: ☒ If no change from last filing, please check this box: ☒

Organization (Name, City, and State)	Position and brief description of work. For consulting firms, indicate the firm's major practice areas, categories of principal clients, and the clients you or your spouse have dealt with directly or derived compensation from.	Check if compensation exceeded \$2,500 for the calendar year of filing or the previous calendar year or represented 5% or more of the person's total compensation over the course of a calendar year

Part 3: Non-compensated Employment

Report any non-compensated elected or leadership position that you or your spouse have held in the preceding two years from the date of filing. Positions include (but are not limited to) an employee, officer, director, trustee, general partner, proprietor, representative, or executor of a business, non-profit, labor organization, or educational institution. Also include any organization or person with whom you or your spouse are negotiating with or have an arrangement with concerning such a position. Exclude positions with religious, arts, social, fraternal or political entities or those solely of an honorary nature.

If none, please check this box: ☒ If no change from last filing, please check this box: ☒

Organization (Name, City, and State)	Position and brief description of position

Part 4: Research Support and Project Funding

4.a. Research Support and Project Funding Received by You: Report any source of research or project funding (i.e., through grants, contracts, or other mechanism) that you have received, from any source including government, industry, and foundations for any purpose in the preceding two years from the date of filing if, for that funding, you are the Principal Investigator, Significant Collaborator, or Project Manager.

If none, please check this box: ☒ If no change from last filing, please check this box: ☒

Funding Organization (Name, City, and State)	Indicate whether you are the Principal (PI) Investigator, Significant Collaborator (SC) or Project Manager (PM)	Brief description of project.	Indicate whether funding is through a grant, contract or other mechanism (check column that applies)		
			Grant	Contract	Other (please specify)

4.b. Research Support and Project Funding Received by Your Spouse: Provide a general description of research and project activities of your spouse in the preceding two years from the date of filing, if they have been funded by any outside source (i.e., any source other than those identified in Part 2, including government, industry and foundations).

If none, please check this box: ☒ If no change from last filing, please check this box: ☒

General description of research and project activities of your spouse

--

Part 5: Consulting Activities Not Reported in Part 2

5.a. Your Consulting Activities: Report any consulting activities for which you have been compensated for and in which you have personally participated during the preceding two years from the date of filing. Indicate the name of clients associated with projects, if those clients provide 15% or more of your annual income.

If none, please check this box: ☒ If no change from last filing, please check this box: ☒

Name of Project	Indicate whether you are a Principal Contractor on that Project (Y/N)	Brief description of project	Check if compensation exceeded \$2,500 for the calendar year of filing or the previous calendar year or represented 5% or more of the person's total compensation over the course of a calendar year	Identification of client's name, if client provided more than 15% of your annual total income

5.b. Consulting Activities of Your Spouse: Provide a general description of consulting activities that your spouse has been compensated for and in which your spouse has personally participated in the preceding two years from the date of filing.

If none, please check this box: ☒ If no change from last filing, please check this box: ☒

General description of consulting activities of your spouse

Part 6: Compensated Expert Testimony

6.a. Your Compensated Expert Testimony: Report any such expert testimony you have provided in the preceding two years from the date of filing.

If none, please check this box: **9** If no change from last filing, please check this box: **9**

For what Person or Organization (Name, City, and State)?	Brief description of issue and testimony and citation to the testimony, if available	Check if compensation exceeded \$2,500 for the calendar year of filing or the previous calendar year or represented 5% or more of the person's total compensation over the course of a calendar year

6.b. Compensated Expert Testimony by Your Spouse: Provide a general description of any expert testimony your spouse has provided in the preceding two years from the date of filing.

If none, please check this box: **9** If no change from last filing, please check this box: **9**

General description of compensated expert testimony of your spouse

Part 7: Assets: Stocks, Bonds, Real Estate, Business, Patents, Trademarks, and Royalties

Report assets held by you, your spouse, and dependent children that collectively had a fair market value greater than \$15,000 at the end of the preceding twenty-four month reporting period or that produced 5% or more of the total income of that person for the past calendar year.

Specific types of assets to report include:

Collectibles held for investment
Commercial crops
Commodity futures
Livestock used for commercial purposes
Non-diversified mutual funds
Partnership interests
Pensions and annuities
Real estate held for investment
Royalties
Stocks, bonds, securities and futures contracts
Trust holdings
Underlying assets of IRAs and 401K Retirement Accounts

Do not report the following types of assets:

Accounts including certificates of deposit, savings accounts, interest bearing checking accounts, or any other forms of deposit in a bank, savings and loan association, credit union or similar financial institution
Diversified mutual funds
Federal Government salary or retirement benefits
Money market funds
Money owed to you, your spouse, or dependent child by a spouse, parent, sibling or child
Securities issued by U.S. Government agencies or Government sponsored corporations such as the Tennessee Valley Authority
Social Security benefits
Underlying holdings of a trust that was not created by you, your spouse or dependent children and for which you, your spouse and dependent children have no past or present knowledge of the holdings or sources of income
U.S. Government obligations (including Treasury bonds, bills, notes and savings bonds)
Your personal residence, unless you rent it out

For pensions, indicate the name of the sponsoring employer. If you have control over the specific investment assets held in your pension account (i.e., it is not independently managed), you also must list those underlying investments or attach an account statement that lists them.

For publicly available mutual funds, list only funds that are **not diversified**.

DO NOT CITE OR QUOTE

Definition of a Diversified Mutual Fund

5 C.F.R. 2640.102 : "A mutual fund is diversified for purposes of this part if it does not have a policy of concentrating its investments in an industry, business, country other than the United States or single State within the United states. Whether a mutual fund meets this standard may be determined by checking the fund's prospectus or by calling a broker or the manager of the fund."

For the funds you do list, indicate the **full name** of the specific mutual fund, not just the general family fund name.

For other publicly available investment funds, such as publicly offered units of limited partnerships, list the full name of the limited partnership, but not its underlying portfolio investments.

For a privately held trade or business, report its name, location and description of activity.

For investment real estate, give the type and location (city and state).

For patents, trademarks, and other sources of royalties, give the name and a brief description.

If none, please check this box: ☒ If no change from last filing, please check this box: ☒

Full Name of Asset	(X) if no longer held

DO NOT CITE OR QUOTE

Part 8: Liabilities

Report for you, your spouse, and dependent children liabilities over \$10,000 owed at any time in the preceding twelve months from the date of filing). Exclude a mortgage on your personal residence or home equity loans, unless the residence is rented out; loans for personal automobiles, household furniture or appliances, where the loan does not exceed the purchase price; and liabilities owed to a spouse, or the parent, sibling, or child of you, your spouse, or dependent child.

Creditors (Name, City, and State)	Type of Liability

Part 9: Identification of any other information related to conflict of interest or appearance of lack of impartiality

Complete this section only if you are being considered for a specific advisory activity. Please consider all your activities, those of your spouse, and dependent children over the past 5 years in considering the following questions.

9.a. Identify the Panel for which you are being considered.

Name of Panel	
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9.b. Other information related to conflict of interest or appearance of lack of impartiality:

Do you know of any reason that you might be unable to provide impartial advice on the matter to come before the panel or any reason why your impartiality in the matter might be questioned (e.g., constraints imposed by your employer on the advice you will be able to provide)?

If yes, please describe those reasons below. If no, please check this box: 9

Description of any reason that you might be unable to provide impartial advice on the matter to come before the panel or any reason why your impartiality in the matter might be questioned

DO NOT CITE OR QUOTE

Attachment 3

U.S. Environmental Protection Agency
Science Advisory Board
Executive Committee
Policies and Procedures Subcommittee*
(Membership Established March 8, 2002)

CHAIR

Dr. Henry Anderson, Wisconsin Division of Public Health, Madison, WI
Also Member: Environmental Health Committee
Integrated Human Exposure Committee

EC MEMBERS

Dr. Domenico Grasso, Smith College, Northampton, MA
Also Member: Environmental Engineering Committee

Dr. Philip Hopke, Clarkson University, Potsdam, NY
Also Member: Research Strategies Advisory Committee
Clean Air Scientific Advisory Committee
Clean Air Scientific Advisory Committee

Dr. William H. Smith, Yale University, Center Harbor, NH

SCIENCE ADVISORY BOARD STAFF

Dr. Angela Nugent, Designated Federal Officer